



THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

December 9, 2013

Paul Massera
California Water Plan Update 2013
California Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236

SUBJECT: COMMENTS ON CALIFORNIA WATER PLAN UPDATE 2013, VOLUME 2

Dear Mr. Massera,

The Metropolitan Water District of Southern California (Metropolitan) appreciates this opportunity to comment on the public review draft of Volume 2 of the California Water Plan Update for 2013 ("CWP 2013 Update"). Metropolitan seeks to enhance collaboration and coordination of water resource planning among all California stakeholders and supports DWR's efforts to do so.

Further detailed comments are provided in Attachment A. If you have any questions regarding these comments or need additional information, please contact Grace Chan at gchan@mwdh2o.com or (213) 217-6403.

Sincerely,

Grace Chan

Manager, Climate and Sustainability Group
Metropolitan Water District of Southern California

ATTACHMENT A: SPECIFIC COMMENTS AND SUGGESTIONS FOR CWP 2013 UPDATE SOUTH COAST HYDROLOGIC REGION		
	Reference	Comments
1	Throughout	Be consistent with abbreviations and classifications of acre-feet quantities. For example: <ul style="list-style-type: none"> SC-27, line 31 – “475 taf” SC-28, line 20 – “1.9 taf” SC-29, line 2 – “1.4 or more million acre-feet” SC-30, line 22 – “897,000 acre-feet” SC-32, line 7 – “4,157 taf” SC-79, line 2 – “1210 thousand acre-feet” SC-79, line 4 – “1350 thousands acre-feet”
2	Throughout	Change “Metropolitan” abbreviation for The Metropolitan Water District of Southern California and replace throughout with “MWDSC” (“Metropolitan” may be confused for the Metropolitan LA PA). For example: <ul style="list-style-type: none"> SC-vii – “Metropolitan” SC-59, line 35 – “The Metropolitan” SC-76, line 12 – “MWDSC” SC-76, line 17 – “MWD” SC-82, line 35 – “the MWD”
3	Throughout	Maintain consistency in reference to Senate Bills. For example: <ul style="list-style-type: none"> SC-vii – “SB x7” SC-91, line 11 – “Senate Bill 7 Statewide Water Conservation” Box SC-1 – “Senate Bill 7x 6 (SBx7 6...”
4	Throughout	Maintain consistency when referring to the various Planning Areas. For example: <ul style="list-style-type: none"> SC-35, line 15 – “PA 401” SC-35, line 22 – “Metropolitan Los Angeles PA” SC-35, line 15 – “Metropolitan LA PA”
5	Throughout	Maintain consistency between all climate change discussions: <ul style="list-style-type: none"> SC-72 lines 35-39 and SC-73 lines 1-2 – This discussion gives a good overview and characterizes impacts that “may” happen. SC-93-SC-97 – This description of potential climate change impacts asserts climate change impacts in a manner inconsistent with previous discussions and characterizations of climate change impacts made in the “Adaptation” discussion SC-98-102. (e.g., (SC-95, lines 22-23) “reduced precipitation... WILL (emphasis added) affect local reservoirs and... groundwater.”)
6	SC-2, line 16	The 2000 Census data should be updated to the 2010 Census data used elsewhere in the report.
7	SC-31, lines 14-15	Check these numbers – they do not add up correctly and are not consistent with SC-62 lines 19-21. (Text cites: 75,000 taf + 10 taf up to 2000 taf = 75,000,000 AF + 100,000 AF up to 2,000,000 AF).
8	SC-33, line 28	“that contributes up to \$195”
9	SC-33, lines 36-38	Change sentence to: “...requires each urban agency statewide to establish a goal in its Urban Water Management Plan (UWMP) to reduce daily per capita water use by 20 percent by 2020.”
10	SC-33, lines 36-41	Urban Water Management Plans should be capitalized.
11	SC-34	The “Water Balance Summary” would be easier to read and more helpful as text. Additionally, the numbers are not consistent with Table SC-15.
12	SC-35, line 11	“...Region consists of four PAs.”
13	SC-36, lines 17-22	The CRA is owned and operated by MWDSC, <i>not</i> San Bernardino Valley MWD. The CRA aqueduct includes four reservoirs and 83 miles of buried conduit and siphons.
14	SC-39, lines 2-7	Which “groundwater basin has two sources of groundwater”? This paragraph does not make sense; there is not one groundwater basin for all of Santa Clara and Metropolitan Los Angeles.
15	SC-40, line 20	Correct the following: “...remove the contaminant chromium VI from local groundwater supplies.”
16	SC-40, lines 15-	These three paragraphs should be bulleted.

	18, lines 19-22 SC-41, lines 1-4	
17	SC-46-47	The reference to “Figure SC-GW-16A” is confusing, since the figure does not have sub-labels. Suggest separating into 4 separate figures or labeling more clearly.
18	SC-53, lines 35-36	Replace first sentence under “Water Governance” with the following: <i>“There is a heavy reliance on groundwater supplies for most of the South Coast Hydrologic Region and many major groundwater basins in the region have been adjudicated.”</i>
19	SC-59, line 30	Change “effect” to “affect”.
20	SC-61-62	Correct text as follows: “Metropolitan has water management program agreements to improve water supply reliability. The programs with Arvin-Edison Water Storage District and Kern Delta Water District can provide 125,000 acre-feet in twelve months under most conditions. Semitropic Water Storage District (Semitropic) and Mojave Water Agency (Mojave) can provide an additional 31,500 acre-feet to 307,520 acre-feet AF depending on the program’s unused capacity and the State Water Project Allocation. All of the Mojave return water and a portion of the Semitropic return water is made available from an exchange of State Water Project supplies, so the return capability is reduced under lower State Water Project allocations. A program with the San Bernardino Valley MWD provides an addition 20,000 acre-feet each year. The water from the program can be carried over in an account up to 50,000 acre-feet of storage.”
21	SC-74, lines 31-32	Update MWDSC Tier 1 rate to \$847 in 2013.
22	SC-76, line 13	“...component <i>of</i> the WSDMP...”
23	SC-76, lines 5-17	MWDSC is the only agency made mention in the first paragraph? It could be noted that everyone’s UWMPs address drought.
24	SC-82, lines 24-26	The first two sentences in this paragraph should be rewritten as follows: <i>“MWDSC has agreements with more than one dozen water agencies located in the South Coast and Tulare Lake Hydrologic Regions to operate conjunctive management programs.”</i>
25	SC-82, lines 33-39	Suggested edits to text: “The annual recharge and extraction by <i>WMWSC</i> member agencies vary and are dependent on factors such as surface water availability and overall water demand. In addition to the <i>MWDSC</i> agreements, some member agencies independently operate conjunctive use projects and recharge additional water to the basins they manage. According to <i>MWDSC</i> , the estimated annual recharge in <i>its service area</i> is about <i>750 taf of active groundwater recharge</i> . The sources of water used for recharge <i>are stormwater, recycled water</i> , the SWP, and the Colorado River.”
26	SC-83, line 1	Please make the following changes: “...include political and institutional constraints, impacted water quality, limited <i>recharge capacities</i> , and complex geology.”
27	SC-86, lines 6-8	The last sentence in the paragraph should be changed as follows and moved to be the first sentence of the third paragraph under the “Water Use Efficiency” on page SC-86: “In its 2010 Regional Urban Water Management Plan, <i>MWDSC</i> restated its goal of achieving <i>a 20 percent per capita water use reduction for its service area through regional water conservation and local resources programs.</i> ”
28	SC-86, lines 14-16	The first sentence of this paragraph should be adjusted as follows: “In an effort to assist its member agencies with program implementation, <i>MWDSC</i> continues <i>several regional</i> programs, <i>for example</i> the “SoCal <i>Water\$mart</i> ” and “Save Water – Save a Buck.”
29	SC-86, line 19	SoCal WaterSmart should be SoCal Water\$mart.
30	SC-86, line 30	Suggested edits to the first sentence of this paragraph: <i>“Many agencies in the South Coast Region have implemented</i> water supply conserving rate structures, <i>such as tiered or seasonal pricing.</i> ”
31	SC-86, line 35	Delete phrase, “31 percent for the landscape.”
32	SC-86, line 41	“internet (Websitess...” should be changed to “internet (<i>websites...</i> ”
33	SC-91, line 6	Delete “Urban Water Use Efficiency & Agricultural Water Use Efficiency – ...”
34	SC-91, lines 15-16	Correct description of SB 7-7: “...requires statewide urban water agencies to reduce their per capital water consumption by 20

		percent by 2020.”
35	SC-91, line 28	Change “Year” to “year”
36	SC-100, lines 40-41 to SC-101, lines 1-2	Replace the sentence beginning with “Adaptive management...” with the following: “Adaptive management is an approach used to respond to these future uncertainties that balances reliability goals and cost impacts by pursuing actions and investing in programs that may provide alternative supplies that could be implemented if and when they are needed.”
37	SC-102, line 31, 39, SC-104, line 37	Figure SC-10 should be Figures SC-25.
38	SC-102, line 39	EI begins to be discussed before some of the background information discussing EI on page SC-103, lines 5-17. The background discussion on EI should be earlier in the “Mitigation” discussion.
39	Tables SC-8,9	“Managed Wetlands” columns should not be included, as all the data are zero.
40	Table SC-9	The Orange County numbers are incorrect. Orange County only shows 12.1 TAF of average groundwater use when groundwater use in Orange County Basin averages close to 300 TAF per year.
41	Table SC-10	<p>The following edits should be made to this table:</p> <ul style="list-style-type: none"> All tenses of verbs in the “Main Purpose” section should be equivalent (e.g., under Colorado River Compact: “The Lower Basin <i>is given</i>...”) <ul style="list-style-type: none"> Boulder Canyon Act: “<i>Authorizes</i> USBR... <i>gives</i> congressional... <i>Apportions</i> the Lower” California Limitation Act: “<i>Confirms</i> California’s...” US Supreme Court AZ v. CA: “<i>Rejects</i> California’s... <i>constitutes</i> use... <i>Rules</i> that... <i>Mandates</i> the... <i>Quantifies</i> Colorado” Colorado River Basin Project Act: “<i>Authorizes</i> construction” Criteria for Coordinated Long Range Operation: “<i>Provides</i> for the coordinated... <i>sets</i> conditions” Colorado River Compact: add “up to 8.5 MAF.” To the end of the Main Purpose section, as it is ambiguous whether an additional 1.0 MAF annually <i>up to 8.5 MAF</i> or 1.0 MAF annually that keeps adding 1.0 MAF year after year to total. California Seven-Party Agreement Date should be 1931 California Seven-Party Agreement should read: “<i>Recommendations from</i> seven California water agencies/districts to the Secretary of Interior <i>on</i>...” Boulder Canyon Act: The last sentence is an incomplete sentence, confusing, and misleading. It could simply say that “USBR manages the storage operations for Lake Mead, working closely with the Lower Basin states.” California Limitation Act: “allocation <i>at</i> 4.4 MAF” US Supreme Court AZ v. CA: Present Perfected Rights should be capitalized. US Supreme Court AZ v. CA: “from the Gila River... constitutes use of <i>Arizona’s</i> Colorado River apportionment”
42	Table SC-11	All quantities are in taf, whereas in Table SC-10, which discusses the same subject, numbers are in MAF. These should be consistent.
43	Table SC-12	Formatting for the Apportionment column should be moved left. Quantities are in maf/yr, whereas in Table SC-11 they are taf and Table SC-10 they are MAF. These should be consistent.
44	Table SC-15	Data is from Central Coast, not South Coast Region.
45	Table SC-23	Y = “Yes” that ordinance applies?
46	Figure SC-6	The colors should be consistent with the colors used for each category in Figures SC-5 and SC-7.
47	Figures SC-5,7	Separate the “unidentified” wells from the “Other” section and make a separate grouping.
48	Figures SC-13,14	The text is cut off, and the legend is confusing – try to simplify.
49	Figure SC-15	The table is labeled “MAF”, but should be “TAF” and all figures should be consistent with Table SC-15.